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February 7, 2002

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
455 12th Street, SW  
Washington, D.C. 20554

**Re: Ex Parte Presentation, IB Docket No. 98-21**

Dear Mr. Caton:

On February 7, 2002, Ben Griffin and the undersigned, representing R/L DBS Company, LLC, met with Susanna Zwerling, legal advisor to Commissioner Copps.

The purpose of the meeting was to discuss certain issues in the pending rulemaking on Part 100 rules for the direct broadcast satellite ("DBS") service, IB Docket No. 98-21. We discussed the background of R/L DBS and its progress towards launch of its satellite and the commencement of service. With respect to certain issues in IB Docket No. 98-21, we expressed the view that there should be no cable cross-ownership restrictions or restrictions on foreign ownership of subscription DBS service providers. We also expressed the view that new geographic service requirements should be imposed other than those currently in the rules. We also discussed the process for assigning DBS channels that currently are vacant.

Pursuant to sections 1.1206(b)(1) and (b)(2) of the Commission's rules, an original and one copy of this letter are being filed with the Office of the Secretary. Copies of this letter are also being served on the Commission personnel who participated in these meetings via electronic mail. Any questions concerning this submission should be addressed to the undersigned.

Sincerely,

Christopher R. Bjornson

cc: Ms. Susanna Zwerling

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